

11. Provide the date, time, and duration of when the stripper off gases were vented to the atmosphere and not sent to the corresponding air pollution control device from January 1, 2015, to present.

Stripper off gas venting may occur if the stripper is operating and the rupture disk on the stripper off gas vent line to the boiler opens while the stripper off gas control valve from stripper is open. During periods in which the stripper is shut down, the system is designed to close the stripper off gas control valve prior to opening the rupture disk in order to prevent venting stripper off gas to the atmosphere through the rupture disk. Conversely, the system is designed to close the rupture disk prior to opening the control valve in order to collect stripper off gas and send it to the boiler for combustion as soon as the control valve is opened.

A review of Pi data trends of rupture disk opening and stripper off gas control valve and stripper operation data was conducted to identify whether there were periods in which stripper off gas venting occurred through the rupture disk. Pi data trends showing periods in which the stripper off gas vent valve was open were reviewed from February 2022 back to April 2019 (the Pi data for the vent valve tag is only available to 4/5/2019 – when the Pi data point was created). Based on a review of available stripper control valve data and rupture disk data, there were no periods in which stripper off gas venting occurred.